

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA; the States
of CALIFORNIA, COLORADO,
CONNECTICUT, DELAWARE, FLORIDA,
GEORGIA, HAWAII, ILLINOIS, INDIANA,
IOWA, LOUISIANA, MICHIGAN,
MINNESOTA, MONTANA, NEVADA,
NEW HAMPSHIRE, NEW JERSEY, NEW
MEXICO, NEW YORK, NORTH
CAROLINA, OKLAHOMA, RHODE
ISLAND, TENNESSEE, TEXAS, and
WASHINGTON; the Commonwealths of
MASSACHUSETTS and VIRGINIA; and the
DISTRICT OF COLUMBIA;

ex rel. Valisure LLC,

Plaintiffs,

v.

GLAXOSMITHKLINE, PLC, AND
GLAXOSMITHKLINE, LLC,

Defendants.

Civil No.: 2:19-cv-04239

ELECTRONICALLY FILED

**STIPULATION TO FURTHER EXTEND DEFENDANTS'
RESPONSIVE PLEADING DEADLINE**

The parties by and through their attorneys hereby request an extension of time for Defendants to file a responsive pleading to Relator Valisure LLC's Amended Complaint in light of the agreement set forth herein.

1. Relator Valisure LLC initiated this qui tam action on September 13, 2019. Dkt. 1.
2. The action was unsealed by Court order on March 13, 2024. Dkt. 46 & 47.

3. Defendant GlaxoSmithKline LLC was served with the Complaint, and accompanying documents specified by the Court's Order of March 13, 2024 (Dkt. 47), on May 17, 2024. Dkt. 61.

4. The First Amended Complaint was filed on May 20, 2024. Dkt. 55.

5. Defendant GlaxoSmithKline LLC was served with the First Amended Complaint on May 20, 2024. Dkt. 60.

6. Defendant GlaxoSmithKline plc was served with the original Complaint, First Amended Complaint, and all documents specified by the Court's March 13, 2024 Order (Dkt. 47) on May 28, 2024. Dkt. 62.¹

7. The parties previously stipulated to an extension of Defendants' time to file their responsive pleadings to August 21, 2024. On July 15, 2024, the Court entered an Order granting the extension of time for Defendants to file their responsive pleadings. Dkt. 68.

8. On June 28, 2024, Defendants filed a Motion to Transfer with the Judicial Panel on Multidistrict Litigation ("JPML"), requesting transfer of this action to the multi-district litigation, *In re Zantac (Ranitidine) Products Liability Litigation*, MDL No. 2924, pending in the Southern District of Florida before the Honorable Robin L. Rosenberg (the "Zantac MDL"). Dkt. 66.

9. On July 24, 2024, Defendants filed a motion to stay these proceedings until after such time as the JPML rules on Defendants' pending Motion to Transfer. Dkt. 69.

10. On August 7, 2024, the parties filed a motion to further extend Defendants' time to file their responsive pleadings until 14 days following denial of transfer to the MDL if the transfer

¹ GlaxoSmithKline plc appears for the limited purpose of joining this stipulation concerning the responsive pleading deadline. It reserves its rights to move to dismiss based on a lack of jurisdiction if the case were to reach the pleadings stage. Defendant GlaxoSmithKline plc and Defendant GlaxoSmithKline LLC are hereinafter referred to collectively as "Defendants."

was denied. Dkt 71. On August 8, 2024, the Court entered an Order granting the extension of time for Defendants to file their responsive pleadings. Dkt. 72.

11. On October 3, 2024, Defendants' Motion to Transfer was denied.

12. As a consequence, Defendants' deadline to file their responsive pleadings was October 17, 2024.

13. On October 17, 2024, the parties informed the Court that they had reached an agreement in principle to resolve this matter and were in the process of negotiating the settlement documents and obtaining necessary approvals from the Department of Justice. In light of this, the parties agreed that there was good cause to further extend the time period until December 16, 2024 for Defendants' response while they finalized the settlement.

14. On December 18, 2024, the Court granted the parties' request to further extend defendants' time to answer or otherwise respond to Relator's Complaint to January 31, 2025 while they worked to finalize the settlement documents and obtain necessary approvals from the Department of Justice. Dkt. 76.

15. On February 7, 2025, the Court granted the parties' request to further extend defendants' time to answer or otherwise respond to Relator's Complaint to February 28, 2025 while they worked to finalize the settlement documents and obtain necessary approvals from the Department of Justice. Dkt. 78.

16. The parties have been working diligently to finalize the settlement agreement, but they are still in the process of finalizing the settlement documents and obtaining necessary approvals from the Department of Justice and the representatives of the named plaintiff states. In light of this, the parties agree that there is good cause to further extend the time period for Defendants' response while they finalize the settlement.

THEREFORE, the parties respectfully request that this Court further extend Defendants' time to answer or otherwise respond to Relator's Amended Complaint to March 28, 2025.

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Dated: March 3, 2025

Respectfully submitted,

/s/ Friedrich Wilhelm W. Sachse

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Counsel for Relator

CERTIFICATE OF SERVICE

I, HEREBY CERTIFY THAT ON March 3, 2025, a copy of the foregoing was served on all counsel of record via CM/ECF.

/s/ Friedrich Wilhelm W. Sachse
Friedrich Wilhelm W. Sachse